

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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PATRICK BRADY,

Plaintiff,

-against-

WAL-MART STORES, INC., YEM
HUNG CHIN and JAMES BOWEN,

Defendants.
-----X

CV-03-3843

(U.S.M.J. J. Orenstein presiding)

**PLAINTIFF'S NOTICE OF
MOTION FOR ATTORNEYS'
FEES, COSTS AND
PRE- AND POST-JUDGMENT
INTEREST**

PLEASE TAKE NOTICE that, on July 22, 2005, or such other date set by the Court, Plaintiff will move this Court, based on the Declaration of Douglas H. Wigdor and all documents attached thereto, Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Attorneys' Fees, Costs and Pre- and Post-Judgment Interest, and the Declarations of A. Kathleen Tomlinson and Frederick K. Brewington submitted herewith, pursuant to 42 U.S.C. § 12205, 42 U.S.C. § 1988, 28 U.S.C. § 1961(a) and Federal Rules of Civil Procedure 54 and 59, for an Order: (1) awarding Plaintiff reasonable attorneys' fees in the amount of \$804,187.00 and costs in the amount of \$42,072.02; (2) amending the Judgment, entered on June 23, 2005, to include an award of attorneys' fees and costs as well as pre-and post-judgment interest; and (3) granting such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1, answering papers, if any, must be served on July 12, 2005 and reply papers must be served on July 19, 2005.

Dated: New York, New York
June 27, 2005

Respectfully submitted,
THOMPSON WIGDOR & GILLY LLP

A handwritten signature in black ink, appearing to read 'DHW', is written over a horizontal line.

By: Douglas H. Wigdor (DW-9737)
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